

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

SRI INTERNATIONAL, INC., a California
Corporation,

Plaintiff and
Counterclaim-Defendant,

v.

INTERNET SECURITY SYSTEMS, INC.,
a Delaware corporation, INTERNET
SECURITY SYSTEMS, INC., a Georgia
corporation, and SYMANTEC
CORPORATION, a Delaware corporation,

Defendants and
Counterclaim-Plaintiffs.

C. A. No. 04-1199 (SLR)

FILED UNDER SEAL

THIS DOCUMENT CONTAINS
MATERIALS WHICH ARE CLAIMED TO
BE CONFIDENTIAL OR RESTRICTED
CONFIDENTIAL – SOURCE CODE AND
COVERED BY A PROTECTIVE ORDER.
THIS DOCUMENT SHALL NOT BE MADE
AVAILABLE TO ANY PERSON OTHER
THAN THE COURT AND OUTSIDE
COUNSEL OF RECORD FOR THE
PARTIES

**DECLARATION OF KYLE WAGNER COMPTON IN SUPPORT OF SRI
INTERNATIONAL, INC.'S RESPONSE TO DEFENDANT SYMANTEC'S
MOTION FOR SUMMARY JUDGMENT OF NON-INFRINGEMENT**

I, Kyle Wagner Compton, declare as follows:

I am an Associate with Fish & Richardson P.C., counsel for Plaintiff SRI
International, Inc. ("SRI"). I make the following statements based on personal
knowledge.

1. Attached as Exhibit A is a true and correct copy of the expert report of Dr.
George Kesidis on Infringement by Symantec, dated April 28, 2006.
2. Attached as Exhibit B is a true and correct copy of U.S. Patent No.
6,321,338.
3. Attached as Exhibit C is a true and correct copy of exhibit 28 to the
deposition of Jeremy Bennett, taken February 2, 2006, Manhunt Training Introduction
Module, bearing production numbers SYM_P_0049758-0049781.
4. Attached as Exhibit D is a true and correct copy of exhibit 31 to the
deposition of Jeremy Bennett, taken February 2, 2006, Symantec Manhunt 3.0 Technical
Evaluation, bearing production numbers SYM_P_0531454-0531503.

5. Attached as Exhibit E is a true and correct copy of the Expert Report of Dr. Jeffery Hansen Regarding Non-infringement, dated May 16, 2006.

6. Attached as Exhibit F is a true and correct copy of excerpts from the deposition transcript of Phillip Porras, taken March 10, 2006.

7. Attached as Exhibit G is a true and correct copy of the Expert Report of Stuart Staniford, taken April 21, 2006.

8. Attached as Exhibit H is a true and correct copy of excerpts from the deposition transcript of Stuart G. Staniford, Ph. D., taken June 6, 2006.

9. Attached as Exhibit I is a true and correct copy of excerpts from the deposition transcript of George Kesidis, taken May 29, 2006.

10. Attached as Exhibit J is a true and correct copy of exhibit 441 to the deposition of Paul M. Agbabian, taken April 25, 2006, Symantec Incident Manager Overview, bearing production numbers SYM_P_0372617-0372666.

11. Attached as Exhibit K is a true and correct copy of exhibit 449 to the deposition of Paul M. Agbabian, taken April 25, 2006, Security Information Management: Reducing the Complexity and Costs Associated With Compliance.

12. Attached as Exhibit L is a true and correct copy of exhibit 444 to the deposition of Paul M. Agbabian, taken April 25, 2006, Symantec Security Information Manager 4.0: Product Functional Requirements, bearing production numbers SYM_P_0288551-0288587.

13. Attached as Exhibit M is a true and correct copy of excerpts from the deposition transcript of Paul Agbabian, taken April 25, 2006.

14. Attached as Exhibit N is a true and correct copy of Galileo: *Performance Test Plan*, dated February 25, 2004, bearing production numbers SYM_P_0034964-0034981.

15. Attached as Exhibit O is a true and correct copy of excerpts from the deposition of William Luk, taken March 9, 2006.

16. Attached as Exhibit P is a true and correct copy of excerpts from *Symantec Security Information Manager 4.0 – Support Team Training: Student Guide*, bearing production numbers SYM_P_0370343-370353 and SYM_P_0370495-370530.

17. Attached as Exhibit Q is a true and correct copy of an e-mail dated April 15, 2005, bearing the production number SYM_P_0280634.

18. Attached as Exhibit R is a true and correct copy of exhibit 439 to the deposition of Paul M. Agbabian, taken April 25, 2006, Symantec Incident Manager: SSMS Solution General RFI bearing production numbers SYM_P_0368978-0368998.

19. Attached as Exhibit S is a true and correct copy of a document, *How does the Customer Get the Box*, bearing production number SYM_P_0285659.

20. Attached as Exhibit T is a true and correct copy of a document, *Architecture/Process List*, dated August 5, 2005, bearing production numbers SYM_P_0136893-0136916.

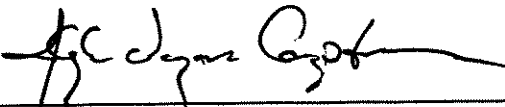
21. Attached as Exhibit U is a true and correct copy of *FlowChaser Data Store (FDS) Specification*, dated July 1, 2002, bearing production numbers SYM_P_0134095-0134099.

22. Attached as Exhibit V is a true and correct copy of excerpts of the rough draft deposition transcript of Jeffery P. Hansen, Ph.D. taken on June 7, 2006.

23. Attached as Exhibit W is a true and correct copy of *FlowChaser Data Store (FDS) Specification*, dated January 9, 2004, bearing production numbers SYM_P_0138243-0138246.

24. Attached as Exhibit X is a true and correct copy of a Symantec document bearing production numbers SYM_P_0036889-0036893.

I declare under penalty of perjury under that the foregoing is true and correct.
Executed this 30th day of June 2006, in Wilmington, Delaware.



Kyle Wagner Compton

CERTIFICATE OF SERVICE

I hereby certify that on July 10, 2006, I electronically filed the **REDACTED –
DECLARATION OF KYLE WAGNER COMPTON IN SUPPORT OF SRI
INTERNATIONAL, INC.’S RESPONSE TO DEFENDANT SYMANTEC’S
MOTION FOR SUMMARY JUDGMENT OF NON-INFRINGEMENT** with the Clerk
of Court the attached document using CM/ECF which will send electronic notification of
such filing(s) to the following Delaware counsel.

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